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**SCHLESINGER CONRAD LAW FIRM**

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*Pro Hac Vice*

*Attorney for Defendants*

*Sandra Gallagher Lewis*

*And David Vincent Lewis*

IN THE UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF TEXAS

MISSION TRADING COMPANY,  
INC.,

Plaintiff,

v.

SANDRA GALLAGHER LEWIS,  
individually; DAVID VINCENT LEWIS,  
individually; DOES 1 – 10, inclusive,

Defendants.

SANDRA GALLAGHER LEWIS,  
individually; DAVID VINCENT  
LEWIS, individually;

Counterclaimants,

MISSION TRADING COMPANY,  
INC., a California corporation;  
SAMEER AND JANE/JOHN DOE  
MISSION, a married couple a married  
couple and fictitiously named spouse;  
DOES 1-100, inclusive;

Counterdefendants.

CASE NO.: 4:16-CV-03368

DEFENDANT AND  
COUNTERCLAIMANTS'  
OBJECTION TO PLAINTIFF'S AND  
THIRD-PARTY DEFENDANT'S  
REPRESENTATION OF NO  
OPPOSITION AS REPRESENTED IN  
DOCKETS 184 AND 185  
[Pertaining to Dkt 181 and 182]  
[Hon. Gray H. Miller;  
Magistrate Nancy K Johnson]

Defendants and Counterclaimants object to Plaintiff's and Sameer Misson's  
representation of no opposition to Docket Nos. 181 and 182, as represented in Docket 184  
and 185 filed this date. Local Rule 7.3 and 7.4 for United State District Court for the



Southern District of Texas make it clear that a response to the pleadings filed by Sameer Misson is due before submission to the Court which is 21 days from date the motion is filed. Specifically, the relevant sections state:

LR7.3 Submission. Opposed motions *will be submitted to the judge 21 days* from filing without notice from the clerk and without appearance by counsel. (Amended by General Order 2009-17, effective December 1, 2009).

LR7.4 Responses. Failure to respond will be taken as a representation of no opposition. Responses to motions

A. Must be filed by the submission day;

B. Must be written;

C. Must include or be accompanied by authority; and

D. Must be accompanied by a separate form of order denying the relief sought.

As reflected in the docket, and acknowledged by opposing party, the motions were filed by Sameer Misson on June 22, 2018. The submission date is 21 days after that or July 13, 2018. There is no good faith basis in law or fact for the submissions asserting no opposition, and in fact an opposition will be filed.

Dated: July 9, 2018

**SCHLESINGER CONRAD LAW FIRM**

BY: Kira A. Schlesinger  
 Attorneys of Record for Defendants,  
 Counterclaimants and Third Party Plaintiffs  
 David and Sandra Lewis

E-Filed, and served, via ECF on July 9, 2018, as follows:

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*Attorney for Plaintiff/Counterdefendants*  
*Mission Trading Company, Inc. and Sameer Misson*

